

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

-----X

In re:	:	
	:	CHAPTER 13
KELLEY M. MILLER	:	
	:	
Debtor	:	CASE NO.: 17-12354-mdc
	:	
PENNYMAC LOAN SERVICES, LLC	:	
	:	11 U.S.C. §362
Movant	:	
vs.	:	
KELLEY M. MILLER	:	
	:	
WILLIAM C. MILLER, ESQ.	:	
	:	
Respondent(s)	:	
	:	

-----X

**OBJECTIONS/RESPONSE TO CREDITOR'S MOTION FOR RELIEF
FROM STAY PURSUANT TO 11 U.S.C SECTION 362(d)(1)**

Debtor in this matter, by and through the undersigned counsel responds to the instant Motion and states the following grounds therefore:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied as stated. Debtor has taken all steps required by her under law to this point

in this case and is in the process of correcting any payment issues concerning this Mortgage loan.

6. Denied. Movant has not demonstrated in any manner that said averment is true and correct.

7. Denied as a conclusion of law. Therefore, the requested relief is premature.

8. Admitted.

9. Denied as stated. Debtor has taken all steps required by her under law to this point in this case and is in the process of correcting any payment issues concerning this Mortgage loan.

10. Denied. Movant has not demonstrated in any manner that said averment is true and correct.

11. Denied. Movant has not demonstrated in any manner that said averment is true and correct.

WHEREFORE, Debtors pray that Movant's Motion be denied, and for such other further relief the Court deems just and proper.

Date: August 15, 2019
Philadelphia, Pennsylvania

/s/ Robert Leite-Young
Robert Leite-Young, Esquire
Attorney for Debtor
6950 Castor Avenue
Philadelphia, Pa 19149
(267) 388-9972

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CERTIFICATE OF SERVICE

I, Robert Leite-Young, certify that on this 15th day of August 2019, the following Debtor's Response has been served upon the following parties, at the addresses designated by said parties for that purpose via the Court's ECF electronic filing system to the following parties of record:

Kevin McDonald, Esq.
KML Law Group, P.C.
701 Market Street, ste 5000
Philadelphia, PA 19106

Trustee William C. Miller, Esq.
(*electronically*)

Date: August 15, 2019
Philadelphia, Pennsylvania

/s/ Robert Leite-Young
Robert Leite-Young, Esquire
Attorney for Debtor
6950 Castor Avenue
Philadelphia, Pa 19149
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 : **11 U.S.C. §362**
 Movant :
 vs. :
KELLEY M. MILLER :
 :
WILLIAM C. MILLER, ESQ. :
 :
 Respondent(s) :
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ORDER DENYING MOVANT MOTION FOR REEF FROM THE AUTOMATIC STAY

AND NOW, this_____ day of_____, 20____, upon consideration of
Movant's Motion pursuant to 11 U.S.C. §362 and Debtor's Response, it is hereby ORDERED
AND DECREED that said Motion is DENIED.

DATED: Philadelphia, Pennsylvania

_____, 2019

Hon. Magdeline D. Coleman
Chief United States Bankruptcy Judge